



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 29, 2023

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Alexander Gulkarov, et al.*,
22 Cr. 20 (PGG)
United States v. Bradley Pierre, et al,
22 Cr. 19 (PGG)

Dear Judge Gardephe:

The Government writes in connection with the above-captioned matters. The Government is conferring with counsel for defendant Jean Pierre about the identity of the third party paying Jean Pierre's attorney's fees, and the parties will write to request a date for that *Curcio* hearing shortly. In the meantime, the Government respectfully requests that the Court issue an order requiring all the other remaining defendants to disclose to the Court whether third parties are paying their attorney's fees as well. The Government agrees with the Court that such arrangements raise potential conflicts of interest that should be addressed at *Curcio* hearings.

Thank you for your consideration of this request.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/
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